

Matthew Phillips  
Wrexham County Borough Council  
Planning Control  
16 Lord Street  
WREXHAM  
LL11 1LG

**Our ref:** NT/2014/116573/01-L01  
**Your ref:** P/2014/0905  
**Date:** 9<sup>th</sup> January 2015

Dear Mr Phillips,

**OUTLINE APPLICATION FOR 365 DWELLINGS AND ERECTION OF 300 SQ  
METRE RETAIL UNIT  
HOME FARM, GRESFORD ROAD, LLAY, LL12 0NW**

Thank you for referring the above application, which was received on 10<sup>th</sup> December 2014.

We have no objection to the proposed development but wish to make the following comments:-

**Flood Risk**

The site is in Zone A as defined by TAN 15 Development and Flood Risk (July 2004) and shown on the Welsh Government's Development Advice Map (DAM). However, Natural Resources Wales' Flood Map for Surface Water shows that some areas of the site are at risk of surface water flooding.

The proposed development has potential to increase flood risk to developments offsite, because it will increase the surface area of impermeable ground, thus reducing percolation and increasing rapid surface water runoff. In accordance with Section 8 of TAN 15, in all zones, development should not increase flood risk elsewhere.

We welcome the applicant's intention to dispose of surface water runoff using a sustainable drainage system. However, no evidence has been provided that ground conditions on site will be suitable for infiltration, there is no indication of any watercourse on site suitable to accept surface water flows, and it is not clear whether the green spaces marked on the site layout will be sufficient to accommodate any required attenuation storage.

Your Authority should be aware that if the site previously discharged surface water into a combined public sewer, it is now likely that the Sewerage Undertaker, i.e. DCWW, will require this to be removed from their system. In this instance, the surface water will either need to be infiltrated on site, discharged into a nearby watercourse, or where this is justified as unfeasible, at a rate agreed with them into their public system.

**RECOMMENDATION:** Prior to the grant of any planning permission, we recommend the production of a surface water management plan to outline the methods for surface water disposal. The plan should include information on how rates of runoff will be restricted and how volumes will be attenuated on site. Where the intention is to dispose to soakaway, this should be shown to work through an appropriate assessment carried out under Building Research Establishment (BRE) Digest 365.

Natural Resources Wales' general recommendation for surface water is that, for the range of annual flow probabilities from 1 in 1 year up to and including the 1% (1 in 100 year) event plus an allowance for climate change, the developed rate of run-off should be reduced in comparison to the undeveloped rate for the same event.

Natural Resources Wales encourages the use of Sustainable Drainage Systems (SuDS), i.e. using techniques to control surface water runoff as close to its origins as possible. Techniques used may include infiltration devices such as soakaways, swales and infiltration trenches; filter drains and permeable and porous pavements; or basins and ponds which may also be a feature of a development. Appendix 4 of TAN 15 contains information on Sustainable Drainage Systems and links to other useful references.

### **Protected Species:**

NRW are satisfied that the ecological survey undertaken for the development (TEP, June 2014) has been undertaken to an acceptable standard. The report states that a number of protected species may be present in the area and goes on to recommend further survey work and mitigation / avoidance measures. Providing all recommendations made within the report (section 7.0) are adhered to and implemented, we consider the impact upon protected species is unlikely to be significant. However we have the following point to make with regard to the report:

- Section 7.7 (bats) and section 7.14 and 7.15 (Great Crested Newts) recommend additional survey work with respect to bats and great crested newts is undertaken prior to development commencing. NRW would recommend that these additional surveys are undertaken prior to full planning permission being granted for the development to ensure appropriate mitigation can be conditioned and to avoid potentially large delays/ alterations to construction timetables etc..

Please note that we have not considered possible effects on all species and habitats listed in section 42 of the Natural Environment and Rural Communities (NERC) Act 2006, or on the Local Biodiversity Action Plan or other local natural heritage interests. To comply with your authority's duty under section 40 of the NERC Act, to have regard to conserving biodiversity, your decision should take account of possible adverse effects on such interests.

We recommend that you seek further advice from your authority's internal ecological adviser and/or nature conservation organisations such as the local Wildlife Trust, RSPB, etc. The Wales Biodiversity Partnership's web site has guidance for assessing proposals that have implications for section 42 habitats and species ([www.biodiversitywales.org.uk](http://www.biodiversitywales.org.uk)).

### **Protected sites:**

The proposals lie approximately 500m from the Chwarel Singret Site of Special Scientific Interest (SSSI). Given the nature of the works and the distance from the protected area we consider it unlikely that the development will impact upon the features, functionality or integrity of this site.

### **Pollution Control**

The development must be connected to the main sewer at this location. Please consult Dwr Cymru / Welsh Water to ensure that there is sufficient headroom within the main sewer at this location to accept the additional flows.

We recommend that a Site Waste Management Plan (SWMP) is drawn up prior to scheme's commencement in order to ensure full duty of care is complied with. Waste should be reused on site where possible. The SWMP should incorporate a monitoring system for wastes removed from site for reuse or disposal.

### **Land Contamination**

Natural Resources Wales recommends that developers should:

1. Follow the requirements of Planning Policy Wales
2. Follow the risk management framework provided in CLR11, Model Procedures for the Management of Land Contamination, when dealing with land affected by contamination.
3. Refer to the WLGA/NRW document 'Development of land affected by contamination: A guide for developers' for the type of information that we require in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health.
4. Refer to Groundwater protection: Principles and practice (GP3).

These comments are based on our assumption that gross contamination is not present at this location. If, during development, gross contamination is found to be present at the site the Local Planning Authority may wish to re-consult Natural Resources Wales.

Yours faithfully,

**Mr. GARETH THOMAS**

**Swyddog Cyswllt Cynllunio / Planning Liaison Officer**

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cc Michael Cunningham Architects